

**Mitchell, Brian**

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**From:** Mitchell, Brian  
**Sent:** Friday, October 25, 2019 11:16 AM  
**To:** Slanczka, Ryan  
**Subject:** FW: 2020006 memo  
**Attachments:** 2020006 signature page.pdf; 2020006MFD.pdf

Brian Mitchell  
RCRA Corrective Action Officer  
EPA Region 7  
LCRD/ROAG  
2.3 – P44  
11201 Renner Blvd  
Lenexa, Kansas 66219  
913-551-7633 work  
816-304-4158 cell

**From:** Jordi, Danell <jordi.danell@epa.gov>  
**Sent:** Friday, October 25, 2019 10:56 AM  
**To:** Mitchell, Brian <Mitchell.Brian@epa.gov>  
**Subject:** FW: 2020006 memo

Good Morning,

Please see the attached, signed QAPP.

*Danell Jordi*

*Executive Office Manager, Laboratory Services and Applied Sciences Division  
U.S. Environmental Protection Agency – Region 7  
11201 Renner Blvd. Lenexa, KS 66219*

*Phone: (913)551-7734*

*Email: [Jordi.Danell@epa.gov](mailto:Jordi.Danell@epa.gov)*

RCRA



587122

**Region 7 Superfund Program**  
**Addendum to the Generic QAPP for Superfund Site Assessment and Targeted Brownfields Assessment Programs (updated October 2017)**  
**for the Downtown Wells Site and Former Electrolux Site**

**Project Information:**

<b>Site Name:</b> Downtown Wells Site and Former Electrolux Site		<b>Location:</b> Jefferson	<b>State:</b> LA
<b>U.S. Environmental Protection Agency (EPA) Project Manager:</b> Brian Mitchell		<b>Superfund Technical Assessment and Response Team (START) Project Manager:</b> Ryan Slanczka	
<b>Approved By:</b>	<b>Prepared For:</b> EPA Region 7 Superfund Division  <b>Prepared By:</b> Ryan Slanczka <b>Date:</b> October 2019  <b>Tetra Tech START Project Number:</b> X903019F0086.003		
<b>Title:</b> START Project Manager			
<b>Date:</b> 10/10/2019			
<b>Approved By:</b>			
<b>Title:</b> START Project Manager			
<b>Date:</b> 10/10/2019			
<b>Approved By:</b>			
<b>Title:</b> START Quality Assurance (QA) Manager			
<b>Date:</b> 10/10/2019			
<b>Approved By:</b>			
<b>Title:</b> EPA Project Manager			
<b>Date:</b> 10/17/19			
<b>Approved By:</b>			
<b>Title:</b> EPA Region 7 QA Manager			
<b>Date:</b> 10/17/2019			

**1.0 Project Management:**

**1.1 Distribution List**

EPA—Region 7: Brian Mitchell, EPA Project Manager  
 Diane Harris, EPA Region 7 QA Manager

Tetra Tech START: Ryan Slanczka, Project Manager  
 Kathy Homer, QA Manager

**1.2 Project/Task Organization**

Brian Mitchell of the EPA Region 7 Superfund Division will serve as the EPA Project Manager for the activities described in this Quality Assurance Project Plan (QAPP). Ryan Slanczka of Tetra Tech, Inc. (Tetra Tech) will serve as the START Project Manager.

**1.3 Problem Definition/Background:**

Description: This site-specific QAPP form is prepared as an addendum to the Generic QAPP for Superfund Site Assessment and Targeted Brownfields Assessment (TBA) Programs (updated October 2017), and specifies site-specific data quality objectives for the sampling activities described herein.

- ☒ Description attached.
- ☐ Description in referenced report: \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

**1.4 Project/Task Description:**

- ☒ Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Preliminary Assessment (PA)
- ☒ CERCLA Site Investigation (SI) ☐ Brownfields Assessment ☐ Removal Action
- ☐ Other (description attached): ☐ Pre-CERCLIS Site Screening ☐ Removal Site Evaluation

Other Description:

Schedule: Field activities are anticipated to occur in November 2019.

- ☐ Description in referenced report: \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

**1.5 Quality Objectives and Criteria for Measurement Data:**

- |                        |   |
|------------------------|---|
| a. Accuracy:           | <input checked="" type="checkbox"/> Identified in attached table. |
| b. Precision:          | <input checked="" type="checkbox"/> Identified in attached table. |
| c. Representativeness: | <input checked="" type="checkbox"/> Identified in attached table. |
| d. Completeness:       | <input checked="" type="checkbox"/> Identified in attached table. |
| e. Comparability:      | <input checked="" type="checkbox"/> Identified in attached table. |
- Other Description:

\*A completeness goal of 100 percent has been established for this project. However, if the completeness goal is not met, EPA may still be able to make site decisions based on any or all of the remaining validated data. No critical samples have been identified.

## MEMORANDUM

**SUBJECT:** Preliminary Assessment and Site Investigation Downtown Wells Site and Former Electrolux Site; Jefferson, Iowa - Approved with Condition

**FROM:** Diane Harris, Regional Quality Assurance Manager  
Laboratory Services and Applied Science Division

**TO:** Brian Mitchell, Project Manager  
Land, Chemical and Redevelopment Division  
RCRA Oversight Authorization Grants & PCB Branch

The review of the subject document prepared by Tetra Tech, Inc. and dated October 10, 2019 has been completed according to the "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations," EPA QA/R-5 March 2001.

Based on the comments below, the document is approved with condition. The document was found to be incomplete in addressing some key areas to the extent of potentially jeopardizing the quality of the data. These areas are fully described in this review memorandum as critical comments and can be adequately addressed by incorporation into the document but without resubmission. The document would not be approved without addressing these issues. General comments identify opportunities for strengthening the document but do not affect approval.

### Critical Comments

1. § 2.5 Quality Control Requirements, page 3 of 5. The last sentence of this section states no field duplicates will be collected but the previous paragraph, Table 1, and page 9 of Appendix A do indicate the collection of a field duplicate. The collection of field duplicates needs to be verified and the QAPP updated accordingly including the evaluation of field duplicate results if they will be collected.
2. Appendix A, Sampling Strategy and Methodology, page 3 of 11.
  - a. The project purpose is described as obtaining adequate data to allow an evaluation of the facility to develop specifications for protecting human health and the environment. However, it is not clear what this statement means in terms of data use.
    - i. How was adequate data determined?
    - ii. Will the data be compared to a standard or some action level and if so, what is that standard or action level? What action might be taken if the standard or action level is exceeded? See also page 4 which refers to determining impacts of previous operations on groundwater but does not describe how impacts to groundwater will be defined.
    - iii. Is the goal simply to determine presence/absence of the contaminants at the laboratory's

CONCURRENCE: Name/Ext/Date/File Location

Jordi: 7734:102119:H:/ENST/IO/QA/ /2019/2020006.mem.docx

DIV/BR	LSASD/IO	LSASD/IO	LSASD/IO	
NAME	<b>DIANE HARRIS</b> <small>Digitally signed by DIANE HARRIS Date: 2019.10.21 15:08:27 -05'00'</small>	<b>MICHAEL DAVIS</b> <small>Digitally signed by MICHAEL DAVIS Date: 2019.10.22 11:13:22 -05'00'</small>		
DATE				
INITIALS				





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7**

11201 Renner Boulevard  
Lenexa, Kansas 66219

**MEMORANDUM**

**SUBJECT:** Preliminary Assessment and Site Investigation Downtown Wells Site and Former Electrolux Site; Jefferson, Iowa – Approved with Condition

**FROM:** Diane Harris, Regional Quality Assurance Manager **DIANE HARRIS**  
Laboratory Services and Applied Science Division

Digitally signed by DIANE  
HARRIS  
Date: 2019.10.21 15:07:54  
-05'00'

**TO:** Brian Mitchell, Project Manager  
Land, Chemical and Redevelopment Division  
RCRA Oversight Authorization Grants & PCB Branch

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**Critical Comments**

1. § 2.5 Quality Control Requirements, page 3 of 5. The last sentence of this section states no field duplicates will be collected but the previous paragraph, Table 1, and page 9 of Appendix A do indicate the collection of a field duplicate. The collection of field duplicates needs to be verified and the QAPP updated accordingly including the evaluation of field duplicate results if they will be collected.
2. Appendix A, Sampling Strategy and Methodology, page 3 of 11.
  - a. The project purpose is described as obtaining adequate data to allow an evaluation of the facility to develop specifications for protecting human health and the environment. However, it is not clear what this statement means in terms of data use.
    - i. How was adequate data determined?
    - ii. Will the data be compared to a standard or some action level and if so, what is that standard or action level? What action might be taken if the standard or action level is exceeded? See



also page 4 which refers to determining impacts of previous operations on groundwater but does not describe how impacts to groundwater will be defined.

- iii. Is the goal simply to determine presence/absence of the contaminants at the laboratory's achievable reporting/detection limits?
  - iv. Has it been verified the achievable reporting/detection limits for the chosen method are acceptable for this project?
- b. Although an assumption can be made, how were the locations for the six DPT borings and the one permanent monitoring well chosen over other possible locations?

#### **General Comments**

- 3. § 3.1 Assessment and Response Actions, page 4 of 5. Please note it is more appropriate to refer to SOPs 2430.14 and 2430.16 for additional details on assessments and response actions for the Regional Laboratory rather than 2430.12.
- 4. Appendix A, Sampling Strategy and Methodology, page 3 of 11. If there are any standards or specific procedures to be applied for the collection of GPS data, it would be useful to note that here.
- 5. Appendix A, Well Development and Well Sampling, page 8 of 11. It should be noted that the well development and purging described in the QAPP differs slightly from the referenced SOPs when it comes to monitored water quality parameters. It is assumed the description in the QAPP takes precedence, but this should be verified prior to sampling.
- 6. Appendix A, Quality Control Sampling, page 9 of 11. Although not specifically stated here, it is assumed that because the QAPP states the QC samples will be analyzed for the same contaminants as the field samples, this also means they will be handled in the same way which will not only include keeping the QC samples cool but also preserving them with HCl.

If you have any questions, please contact me at x7258.

R7QAO Document Number: 2020006

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<b>Title:</b> START Project Manager				<b>Date:</b> 10/10/2019	
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<b>Title:</b> START Quality Assurance (QA) Manager	<b>Date:</b> 10/10/2019	<b>Prepared By:</b> Ryan Slanczka			
<b>Approved By:</b>			<b>Date:</b> October 2019		
<b>Title:</b> EPA Project Manager	<b>Date:</b> 10/17/19				
<b>Approved By:</b>			<b>Tetra Tech START Project Number:</b>		
<b>Title:</b> EPA Region 7 QA Manager	<b>Date:</b> 10/17/2019	X903019F0086.003			

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